



State of New Jersey

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DEPARTMENT of ENVIRONMENTAL PROTECTION

AIR QUALITY, ENERGY AND SUSTAINABILITY

Division of Air Quality

Bureau of Stationary Sources

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BOB MARTIN
Commissioner

January 28, 2016

Mr. Steve Riva, Chief
Permitting Section
USEPA, Region 2
290 Broadway, 25th Floor
New York, NY 10007-1866

**Combined Part 71 Permit for OCEAN COUNTY LANDFILL (PI 78931) and
MRPC Holdings (PI 78901), Draft Part 71 Initial Operating Permit (draft), Permit
Number P71-OCMH-001**

Dear Mr. Riva:

Thank you for the opportunity to comment on the draft permit.

The following is our list of comments and suggestions:

Part A: General Comments

1. As this is a single permit, and all conditions of the permit are included in one document, NJDEP suggests breaking out the compliance plan for the individual units associated with each of the facilities. This will allow each entity to demonstrate compliance.
2. NJDEP requests that all the modifications approved after the initial Part 70 Operating Permit be included in this draft permit. The new and modified equipment and associated modified conditions should have been included in the permit as USEPA was aware of those changes. It is understood that the facilities are submitting USEPA additional information to address this concern.

Part B: Requirements Missing in Draft Permit

1. The draft does not include a provision that a copy of all information submitted to EPA pursuant to NSPS shall also be submitted to NJDEP, pursuant to 40 CFR 60.4(b). Based on the NJDEP comments on the predraft permit, the draft was changed to require that

NESHAP information be submitted to NJDEP (Ref. 21), pursuant to 40 CFR 63.10(a)(4)(ii). We again request that all submittals being sent to EPA should be copied to NJDEP.

2. The draft does not include 40 CFR 60.18 requirements for an open flare.
3. The draft (I.C. Applicable Air Quality Regulations) does not list N.J.A.C. 7:27-18 or Non-Attainment NSR among the applicable Air Quality Regulations. Also, the draft (II.A., Source-wide, NJAC7:27 category) does not include N.J.A.C. 7:27-1.
4. The draft (I.C. Applicable Air Quality Regulations) does not list 40 CFR 63 Subpart JJJJJ among the applicable Air Quality Regulations. 40 CFR 63 Subpart JJJJJ applies to the 2.5 MMBtu/hr boiler burning #2 fuel oil (L-02-3-3).
5. The draft does not include annual and hourly emission limits for total HAPS, hydrogen chloride, tetrachloroethylene, and methane.
6. The draft does not include an operating scenario for treated landfill gas as fuel for the 2.5 MMBtu/hr boiler.
7. Unlike to NJDEP Title V permits, Potential to Emit (PTE) for the whole facility is not included in Part 71 permit. The PTE table is only included in the Statement of Basis, but should be included in the permit itself.
8. The draft does not include the percentage of methane in landfill gas monitoring for engines set EU-E1 (old engines) even though methane monitoring in landfill gas for engines set EU-E2 (new engines) is required. Methane monitoring should be required for all engines in order to determine the fuel heating value.


Part C: Inconsistencies in Draft Permit

1. The facility PTE table is not consistent with the explanatory text in the Statement of Basis. According to the Statement of Basis, PTE is based on all twelve LFGTE operations engines operating at full capacity and the flares burning the gas that is beyond the capacity of the engines. NJDEP agrees with that approach. However, Table 1 includes emissions for both engines and flares that are based on the maximum emissions derived from 3210 MMscf/year of landfill gas being burned in either engines or flares. For example, NO_x emissions were calculated as the sum of 65.96 + 64.7 + 53.7 tons per year, respectively. If this is truly a single permit, the PTE cap should be established as the worst case scenario of burning no more than 3210 MMscf/year of landfill gas at the facility.
2. The draft (IIA. Source wide, Ref. #8c and 8d) lists the total heat input for the set of engines model 3520 (new) at 861,108 MMBTU/hr (HHV) and 1844 MMscf/yr. The value approved by NJDEP is 874,000 MMBTU/hr (HHV) and 1970 MMscf/yr.

3. The draft (IIC. LFGTE Operations, (Engines), Ref. 239) lists the NOx emission limit at 0.3 lb/MMBTU. The value provided to NJDEP is 0.289 lb/MMBTU.
4. Draft EU-E2 U7-1 through -U7-6, Ref. 264 and 265, NOx limit in lb/hr and lb/bhp-hr was listed as non-attainment NSR [NJAC 7:27-18], which is correct. NOx is also a PSD pollutant, which should be addressed in the permit.
5. Please correct a typo in Ref. 221 and 227. It should say EU-E1-U1 through-U6.
6. Insignificant source: IS-L-01 2000-gallon storage tank for #2 diesel fuel. The value provided to NJDEP is 1000 gal.
7. General Reporting Requirements III.B.2 and Compliance Certifications IV.D. do not require a copy of annual and semi-annual reports to be submitted to NJDEP. NJDEP requests a copy of all submittals.
8. NJDEP recommends that references to "round chart" should be eliminated from the permit (for example, Ref. 15 and 80) because round chart data are not accurate.
9. The draft does not include a new 250 kW emergency generator and two screeners at the site.

Should you want more information regarding this matter, please call Bachir Bouzid at 609-777-0286.

Sincerely,


Kenneth Ratzman
Assistant Director,
Division of Air Quality